

SOLYM CARRIERS LTD.

- against -

HUDSON SHIPPING LINES, INC.

Defendant.

08 CIV 4459

08 CV _____
ECF CASE

State of Connecticut)
) ss: SOUTHPORT
County of Fairfield)

1. I am a member of the Bar of this Court and represent the Plaintiff herein. I am familiar with the facts of this case and make this Affidavit in support of Plaintiff's prayer for the issuance of a Writ of Maritime Attachment and Garnishment, pursuant to Rule B of the Supplemental Admiralty Rules of the Federal Rules of Civil Procedure.

2. I have attempted to locate the Defendant, HUDSON SHIPPING LINES, INC., within this District. As part of my investigation to locate the Defendant within this District, I checked the telephone company information directory all area codes within the District, as well as the white and yellow pages for New York listed on the Internet or World Wide Web, and did not find a listing for the Defendant.

3. I checked the New York State Department of Corporations' online database which showed two listings: One in the name of Hudson Shipping Lines, Corp. and another in the

name of Hudson Shipping Co., Inc., respectively. Each of these listings, however, indicate that the entities are domestic business corporations which are both inactive in the State. *See Department of State Division of Corporations Entity Information, attached as Exhibit 1.*

4. Furthermore, the Defendant in this case is Hudson Shipping Lines, Inc. and a website indicates that the only U.S. address or location for Hudson Shipping Lines, Inc is in Illinois. *See Home Page of Hudson Shipping Lines, attached as Exhibit 2.*

5. For these reasons, I submit that Defendant cannot be found within this District within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

6. Upon information and belief, the Defendant has, or will have during the pendency of this action, tangible and intangible property within the District subject to the jurisdiction of this Court.

PRAYER FOR RELIEF FOR AN ORDER ALLOWING SPECIAL PROCESS SERVER

7. Plaintiff seeks an Order, pursuant to Rule 4(c) of the Federal Rules of Civil Procedure, appointing Thomas L. Tisdale, Claurisse Campanale-Orozco, Lauren C. Davies, or any other partner, associate, paralegal or agent of Tisdale Law Offices, to serve the Verified Complaint, Process of Maritime Attachment and Garnishment, Interrogatories or other process, including any amended pleadings filed in this action upon the garnishee(s) who, based upon information and belief may hold assets of, for or on account of the Defendant.

8. Plaintiff seeks this Order to serve the Process of Maritime Attachment and Garnishment will deliberate speed in order to fully protect itself against the potential of being unable to satisfy any judgment or award obtained by Plaintiff against Defendant.

9. To the extent that Plaintiff's Application for an Order appointing a special process server does not involve the restraint of physical property, service does not need to be effected by the Marshal's Office. Service sought to be carried out by Plaintiff is the delivery of the Process of Maritime Attachment and Garnishment to the various garnishees identified in the writ.

PRAYER FOR RELIEF TO SERVE LATER IDENTIFIED GARNISHEES

10. Plaintiff further requests that this Court grant it leave to serve any additional garnishee(s) who may, upon information and belief, obtained in the course of this litigation, to be holding or believed to be holding, property of the Defendants, within this District. Obtaining leave of Court at this time to serve any later identified garnishee(s) will allow for prompt service of the Writ of Maritime Attachment and Garnishment without the need to present to the Court amended Process to add future identified garnishee(s).

PRAYER FOR RELIEF TO DEEM SERVICE CONTINUOUS

11. Plaintiff also respectfully requests that the Court grant it leave, as set out in the accompanying Ex Parte Order for Process of Maritime Attachment, for any process that is served on a garnishee to be deemed effective and continuous service of process throughout any given day on which process is served through the next day, provided that process is served the next day, to authorize service of process via facsimile or e-mail following initial in personam service.

12. This is Plaintiff's first request for this relief made to any Court.

Dated: May 13, 2008
Southport, CT


Claurisse Campanale-Orozco

Sworn and subscribed to before me
this 13 day of May 2008.

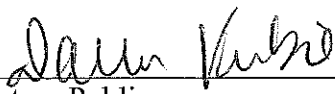

Notary Public

EXHIBIT 1

NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: HUDSON SHIPPING LINES CORP.

Selected Entity Status Information

Current Entity Name: HUDSON SHIPPING LINES CORP.
Initial DOS Filing Date: JUNE 11, 1999
County: NEW YORK
Jurisdiction: NEW YORK
Entity Type: DOMESTIC BUSINESS CORPORATION
Current Entity Status: INACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

HUDSON SHIPPING LINES CORP.
350 FIFTH AVENUE
SUITE 4206
NEW YORK, NEW YORK, 10118

Chairman or Chief Executive Officer

LAURA LEE
350 FIFTH AVENUE
SUITE 4206
NEW YORK, NEW YORK, 10118

Principal Executive Office

HUDSON SHIPPING LINES CORP.
350 FIFTH AVENUE
SUITE 4206
NEW YORK, NEW YORK, 10118

Registered Agent

NONE

NOTE: New York State does not issue organizational identification numbers.

[Search Results](#)

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[Division of Corporations, State Records and UCC Home Page](#) [NYS Department of State Home Page](#)

NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: HUDSON SHIPPING CO., INC.

Selected Entity Status Information

Current Entity Name: HUDSON SHIPPING CO., INC.

Initial DOS Filing Date: MARCH 10, 1921

County: NEW YORK

Jurisdiction: NEW YORK

Entity Type: DOMESTIC BUSINESS CORPORATION

Current Entity Status: INACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

C/O SHOLLER SHAYNE & HORN
46 TRINITY PLACE, 3RD FL.
NEW YORK, NEW YORK, 10006

Registered Agent

NONE

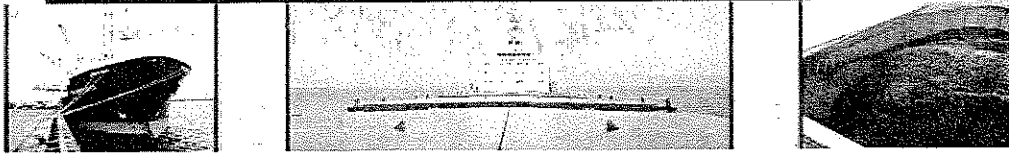
NOTE: New York State does not issue organizational identification numbers.

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EXHIBIT 2

WELCOME TO HUDSON SHIPPING LINES[COMPANY PROFILE](#) [MISSION STATEMENT](#) [SERVICES](#) [VESSELS](#) [AREAS OF SERVICE](#) [PARTNERSHIPS](#) [CONTACT US](#) [PHOTO GALLERY](#) [LINKS](#) [DISCLAIMER](#) [SITE MAP](#)**CONTACT US**

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50 Shirley Street
Nassau, Bahamas

North America
3701 Commercial Avenue
Northbrook, IL 60062 USA
Telephone: 847 564 4660
Fax: 847 564 3670

Australia
11 Kintyre Crescent
Floreat Park
Perth, WA 6014 Australia
Telephone: +61 89 387 3800
Fax: +61 89 387 2388

[\[Home\]](#)

Contact us by e-mail at mail@hudsonshipping.com or fill out the inquiry form below to reach us directly.

First Name:	Last Name:
<input type="text"/>	<input type="text"/>
Title:	
<input type="text"/>	
Address 1:	Address 2:
<input type="text"/>	<input type="text"/>
City:	State:
<input type="text"/>	<input type="text"/>
Zip Code:	Country:
<input type="text"/>	<input type="text"/>
Telephone:	Fax Number:
<input type="text"/>	<input type="text"/>
E-Mail Address:	
<input type="text"/>	
Comments:	
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